

### REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 16-24 are presently active, Claims 1-15 have been previously canceled without prejudice or disclaimer. The present Amendment amends Claim 16 without introducing any new matter.

The November 2, 2007 Office Action rejected Claims 16-24 under 35 U.S.C. § 103(a) as unpatentable over Ream (U.S. Patent No. 6,363,228) in view of Ito (Japanese Patent Application No. JP 11-344,875) and further in view of Murakami (Japanese Patent Application No. JP 09-175,687).

In response, Claim 16 is amended. Claim 16 is amended to further recite features related to the download of unique correction data from the internet. These features find non-limiting support in Applicants' disclosure as originally filed, for example at least at p. 10, ll. 11-16. No new matter has been added.

In response to the rejection of Claims 16-24 under 35 U.S.C. § 103(a), Applicant respectfully requests reconsideration of this rejection, and traverses the rejection, as discussed next.

Briefly summarizing, Claim 16 is directed to an image forming apparatus for correcting color difference and position difference of the transfer belt unit. The image forming apparatus includes, *inter alia*: a controller configured to read the unique correction data and ***a manufacturing information of the transfer belt unit stored in a first memory*** contained in the transfer belt unit connected to a main body of the image forming apparatus, and ***configured to download the unique correction data from a server on the internet to the second memory by using the manufacturing information***, and transfer the unique correction data from the first memory to a second memory contained in the main body of the image

forming apparatus; and a correction control unit configured to correct the color difference and position difference based on the unique correction data stored in the second memory.

Turning now to the applied references, Ream describes a printing apparatus 10 for registering a correction pattern of a transfer belt 20 that can be removably inserted into the apparatus 10. (Ream, Abstract.) Critical data is measured at time of the manufacture of the transfer belt 20, and such calibration data is stored into a memory of a subassembly 15. (Ream, Abstract, col. 3, ll. 51-56, Fig. 1.) Ream teaches that a surface velocity profile can be stored in the memory. (Ream, col. 3, ll. 58-59.) Ream's subassembly 15 may also store a serial number and a bit pattern so that the apparatus 10 can recognize an authorized unit. (Ream, col. 4, ll. 28-31.)

However, the cited passages of Ream fail to teach a controller configured to download the unique correction data from a server over the internet to the second memory by using the manufacturing information, as required by Applicant's amended Claim 16. As shown by the above passages, Ream's apparatus 10 is clearly not configured to perform such a function.

The reference Ito is directed to an image forming device wherein a memory 25 stores conditions of the transfer body unit 5. Ito explains that the conditions may include information on the geometric distance of the rollers of the transfer body unit, or a belt revolution period. (Ito, ¶¶ [0004], [0010].) However, the cited passages of Ito are also silent on Applicant's Claim 16 feature directed to the download of data from the internet, based on manufacturing information.

The reference Murakami, used by the pending Office Action to form a 35 U.S.C. § 103(a) rejection, also fails to remedy the deficiencies of Ream and/or Ito, as next discussed. Murakami's describes a belt conveyor and a system that can measure the belt's surface speed by a contact-less method. (Murakami, Abstract.) But the cited passages of Murakami are silent on any features related to a controller that is configured to download the unique

correction data from a server on the internet to the second memory by using the manufacturing information, as required by Applicant's amended Claim 16.

Therefore, even if the combination of Ream, Ito, and/or Murakami is assumed to be proper, the cited passages of the combination fail to teach every element of Applicants' Claim 16. Specifically, the cited passages of combination fail to teach the features related to the download of unique correction data from the internet. Accordingly, Applicant respectfully traverses, and requests reconsideration of, the rejection based on Ream, Ito, and Murakami.

Accordingly, independent Claim 16 patentably distinguishes over the applied references. Since Claims 17-24 are dependent directly or indirectly from Claim 16, substantially the same arguments set forth above also apply to these dependent claims. Therefore, the rejections of Claims 16-24 are believed to be overcome.

Consequently, in light of the above discussions, Applicants respectfully request withdrawal of the rejection of Claims 16-24. The application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

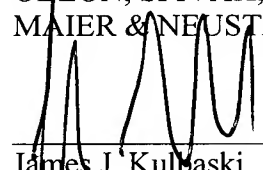
Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact Applicant's undersigned representative at the below listed telephone number.

Respectfully submitted,

Customer Number  
**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 06/04)

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.



---

James J. Kulbaski  
Attorney of Record  
Registration No. 34,648

Nikolaus P. Schibli, Ph.D.  
Registered Patent Agent  
Registration No. 56,994

JJK\NPS:mca

I:\ATTY\NPS\24's\242294US\242294US\_AM\_OA\_11.02.2007.doc